

**UNITED STATE DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

RANDAL C. KRUEGER,

Case No.: 2:18-cv-13160-BAF-APP

Plaintiff,

**Judge Bernard A. Friedman
Magistrate Judge Anthony P. Patti**

v.

EQUIFAX INC.

Defendant.

Randal C. Krueger
16764 Lochmoor Cir. E.
Northville, MI 48168
Plaintiff Pro Se

CLARK HILL PLC
Jordan S. Bolton
151 S. Old Woodward Ave., Ste. 200
Birmingham, MI 48009
(248) 988-1839
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Attorneys for Equifax Inc.

**DEFENDANT EQUIFAX INC.'S
ANSWER AND DEFENSES TO PLAINTIFF'S COMPLAINT**

Defendant Equifax Inc., by Counsel, hereby files its response to Plaintiff's Complaint ("Complaint") as follows:

PRELIMINARY STATEMENT

Equifax Inc. denies any and all allegations contained in the headings and/or unnumbered paragraphs in the Complaint.

ANSWER

In response to the specific allegations in the enumerated paragraphs in the

Complaint, Equifax Inc. responds as follows:

1. Equifax Inc. is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1.

2. Equifax Inc. is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2.

3. Equifax Inc. reasserts and re-alleges its responses and defenses as set forth above in Paragraphs 1 through 2.

4. Equifax Inc. denies the allegations in Paragraph 4.

5. Equifax Inc. denies the allegations in Paragraph 5.

6. Equifax Inc. denies the allegations in Paragraph 6.

7. Equifax Inc. denies the allegations in Paragraph 7.

8. Equifax Inc. denies the allegations in Paragraph 8.

9. Equifax Inc. denies the allegations in Paragraph 9.

10. Equifax Inc. denies the allegations in Paragraph 10.

11. Equifax Inc. reasserts and re-alleges its responses and defenses as set forth above in Paragraphs 1 through 10.

12. Equifax Inc. denies the allegations in Paragraph 12.

13. Equifax Inc. denies the allegations in Paragraph 13.

14. Equifax Inc. denies the allegations in Paragraph 14.

15. Equifax Inc. denies the allegations in Paragraph 15.

16. Equifax Inc. is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 16.

17. Equifax Inc. reasserts and re-alleges its responses and defenses as set forth above in Paragraphs 1 through 16.

18. Equifax Inc. denies the allegations in Paragraph 18.

19. Equifax Inc. is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 19.

20. Equifax Inc. reasserts and re-alleges its responses and defenses as set forth above in Paragraphs 1 through 19.

21. Equifax Inc. is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 21.

22. Equifax Inc. is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 22.

23. Equifax Inc. is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 23.

24. Equifax Inc. denies the allegations in Paragraph 24.

25. Equifax Inc. reasserts and re-alleges its responses and defenses as set forth above in Paragraphs 1 through 24.

26. Equifax Inc. denies the allegations in Paragraph 26.

27. Equifax Inc. denies the allegations in Paragraph 27.

28. Equifax Inc. denies Plaintiff is entitled to any relief claimed in Paragraph 28.

29. Equifax Inc. denies Plaintiff is entitled to any relief claimed in Paragraph 29.

30. Equifax Inc. denies Plaintiff is entitled to any relief claimed in Paragraph 30.

31. Equifax Inc. denies Plaintiff is entitled to any relief claimed in Paragraph 31.

32. Equifax Inc. is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 32.

33. Any allegation in Plaintiff's Complaint not heretofore specifically responded to by Equifax Inc. is hereby denied.

DEFENSES

Without assuming the burden of proof where it otherwise rests with Plaintiff, Equifax Inc. pleads the following defenses to the Complaint:

FIRST DEFENSE

Plaintiff's Complaint fails to state a claim against Equifax Inc. upon which relief can be granted.

SECOND DEFENSE

Plaintiff's damages, if any, were not caused by Equifax Inc., but by another

person or entity for whom or for which Equifax Inc. is not responsible.

THIRD DEFENSE

Equifax Inc. is not a proper party to this action.

FOURTH DEFENSE

Equifax Inc. is not a consumer reporting agency under the Fair Credit Reporting Act.

WHEREFORE, having fully answered or otherwise responded to the allegations contained in Plaintiff's Complaint, Equifax Inc. prays that:

- (1) Plaintiff's Complaint be dismissed in its entirety and with prejudice, with all costs taxed against Plaintiffs;
- (2) it be dismissed as a party to this action; and
- (3) it recover such other and additional relief, as the Court deems just and appropriate.

Respectfully submitted this 17th day of October, 2018.

/s/ Jordan S. Bolton

CLARK HILL PLC

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Attorneys for Equifax Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of October, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and sent a copy via U.S. Mail to:

Randal C. Krueger
16764 Lochmoor Cir. E.
Northville, MI 48168

/s/ Jordan S. Bolton

Jordan S. Bolton